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Interim Co-Lead Class Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

IN RE ZOOM VIDEO
COMMUNICATIONS, INC. PRIVACY
LITIGATION

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Pursuant to L.R. 3-4(a), additional parties are
listed on the signature page.

Master File No. 5:20-cv-02155-LHK

**DECLARATION OF TINA WOLFSON
PURSUANT TO LOCAL RULE 6-2**

Judge: Hon. Lucy H. Koh
Courtroom: 8

DECLARATION OF TINA WOLFSON
5:20-CV-02155-LHK

DECLARATION OF TINA WOLFSON PURSUANT TO LOCAL RULE 6-2

I, Tina Wolfson, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true:

1. I am an attorney duly licensed to practice before all courts of the State of California, this Court, as well as other state and federal courts. I am a founding member of the law firm Ahdoot & Wolfson, PC (“AW”), founded in 1998, and I have litigated complex consumer class actions for two decades. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify regarding those matters. I respectfully submit this Declaration in support of the parties’ Joint Stipulation and [Proposed] Order to Allow Plaintiffs to File a First Amended Consolidated Class Action Complaint, and in accordance with Local Rule 6-2.

2. On July 17, 2020, the Court issued an Order Adopting Proposed Briefing Schedule; Denying Request to Stay Discovery; Continuing Case Management Conference (“Scheduling Order”) [Dkt. No. 113]. The Scheduling Order required: a consolidated amended complaint to be filed on or before July 30, 2020; any motion to dismiss to be filed on or before September 14, 2020; and any opposition to the motion to dismiss to be filed on or before October 14, 2020.

3. On July 30, 2020, Plaintiffs Saint Paulus Lutheran Church, Heddi N. Cundle, Lisa T. Johnston, Therese Jimenez, M.F., Kristen Hartmann, Isabelle Gmerek, Oak Life Church, Stacey Simins, Caitlin Brice, and Cynthia Gormezano (collectively, “Plaintiffs”), filed their Consolidated Amended Class Action Complaint against Defendant Zoom Video Communications (“Zoom”) [Dkt. No. 114].

4. On September 14, 2020, Zoom filed its Notice of Motion and Motion to Dismiss the Consolidated Amended Complaint (“Motion to Dismiss”) [Dkt. No. 120].

5. Plaintiffs’ deadline to respond to the Motion to Dismiss is October 14, 2020.

6. The Motion to Dismiss is currently set for hearing on February 4, 2021.

7. By stipulation the parties seek to withdraw Zoom’s Motion to Dismiss, allow Plaintiffs to file the First Amended Consolidated Class Action Complaint on or before October 28, 2020, and allow Zoom to answer, move or otherwise respond to the First Amended Consolidated

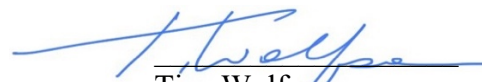
1 Class Action Complaint on or before December 2, 2020 (with Plaintiffs' opposition to any motion
2 due on December 30, 2020, and Zoom's reply in support of any motion due on January 21, 2021).

3 8. Plaintiffs and Zoom have met and conferred regarding issues related to the Motion to
4 Dismiss, and have agreed that in order to focus the legal issues presented to the Court, and thereby
5 conserve the parties' and judicial resources, the best course is to allow Plaintiffs to file a First
6 Amended Consolidated Class Action Complaint. This requires modification of the deadlines set by
7 the Court's July 17, 2020 Scheduling Order. [Dkt. No. 113].

8 9. No other time modifications have occurred in this matter at the request of the parties
9 since the Court's July 17, 2020 Scheduling Order, whether by stipulation or court order.

10 10. Any newly filed motion to dismiss will retain the same hearing date of February 4,
11 2021. Accordingly, the case schedule should be unaffected.

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13 I declare under penalty of perjury pursuant to the laws of the United States of America that
14 the foregoing is true and correct. Executed this 14th day of October, 2020 in Los Angeles,
15 California.

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